

## **Exhibit E**

**Cynthia Davis**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
SUZZANNE ANDERSON, et al.,

**AFFIDAVIT OF**  
**CYNTHIA DAVIS**

Plaintiffs,

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.  
-----X

STATE OF DELAWARE     )  
                                      : SS.:  
COUNTY OF KENT         )

CYNTHIA DAVIS, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 668 Lochmeath Way, Dover DE 19901.

2. I am currently 62 years old, having been born on April 18, 1960.

3. I am the sister of Harry Davis, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My brother passed away from multiple myeloma and respiratory illness on November 11, 2016. It was medically determined that these illnesses were causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. Harry is the oldest of six children, and I was one of the youngest siblings. He was always there for us as a big brother. We all had a good relationship with Harry. We grew up close. Our family would all go on vacations together, and Harry would babysit me. Even when we grew older, Harry was always willing to share with his younger siblings. When Harry began working, the younger siblings followed in his footsteps. Harry became a fireman, and I became

a police officer. As we grew up, Harry lived in Pennsylvania, and I lived in Delaware. Through the years, we would see each other on occasion. My mother lived here with me, so he would come to visit us. As a family, we pulled together to take care of my mother when she was older. We always supported each other in that way.

6. In 2001, I was living in New York. I was a police officer for the NYPD. Harry and I saw each other much more often then, and we also lived together for a period of time. I responded to the World Trade Center on 9/11/2001 and so did he. Harry was in FDNY Squad 18, and his fire truck was shown on the news. It was a very stressful day because I couldn't reach him. It was also stressful because earlier that year, Harry and I had lost our sister. I didn't want to lose another sibling so soon. It turned out that Harry wasn't actually with his squad that day, as he was just coming off an assignment in the Bronx. But he joined his team shortly after the buildings came down. He was actually interviewed on the news, and one of our cousins said he saw Harry on TV, covered in dust. Harry worked for a few weeks at the World Trade Center site on a rotating schedule.

7. Harry was very private about illness, being a fireman. We knew illnesses were coming in the Police Department, because we started to see people getting sick from their exposure at Ground Zero. They initially said it was safe. But Harry was not very forthcoming about the fact that he was ill. When he got ready to retire, he talked to me about retiring on disability. Other than that, he didn't tell me much about his illness at first. I also didn't want our mother to worry about Harry being sick. Although our mother was in failing health herself, she was still aware enough to grasp that Harry might have been sick. So, we didn't talk about it. That year, I took my mother and aunt to visit Harry. I noticed that he was really weak. He went to go move something, like a piece of furniture in his living room, and he couldn't move it. That's when I knew something was really wrong.

8. Three months before Harry died, our mother died. At that point, Harry was moving slowly and walking with a cane. We didn't think he was going to die—he was still pretty functional at that point—but we knew that wasn't typical for Harry. He was probably in a lot of pain, but he wasn't expressing it. We were all dealing with our mother's death.

9. I know that Harry had a fear of dying a slow death. I think he had a fear of wasting away, because he saw many of his coworkers die that way (from the 9/11-related



illnesses). When he got sick, he tried to put on weight so that people couldn't tell he was becoming frail from the illness.

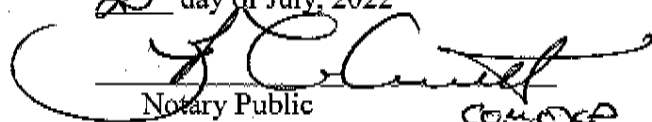
10. Two or three weeks before Harry died, he came to visit me. My mother had a recliner she loved to sit in before she died, and I wanted to give it to Harry. My son and I helped him put it in the car. I asked him, "How are you going to get that out of the car by yourself when you get home?" But he waved me off. He didn't want to show me how sick he really was. He was a big brother. The thought of losing another sibling was stressful to me. I didn't think his death was going to be as imminent as it was. It's also hard to show love to your sibling but respect their privacy at the same time. So, I stayed quiet about things.

11. When Harry was on his death bed, his wife called me down to their house in Pennsylvania to say goodbye to him. It was hard, because I didn't know Harry was that far along with his illness. With our mother, at least I had some closing words to say to her. But so much was left unsaid to my older brother Harry. It was just unexpected.

12. The attacks on the World Trade Center on 9/11 caused families unnecessary grief. Did Harry have to die at 65? No. How can you replace the years in a life of someone who died from a 9/11-related illness? You can't. My mother has siblings who are in their eighties and nineties, that still enjoy each other's company. Those are years that Harry and I could've spent together. I miss him terribly.

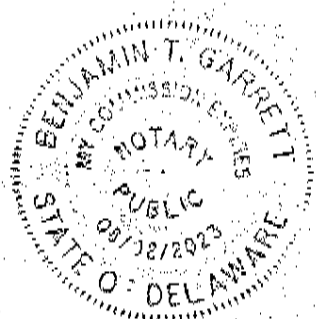
  
CYNTHIA DAVIS

Sworn to before me this  
25<sup>th</sup> day of July, 2022

  
Notary Public

COMOXP

08-02-2023



**Emiko Uhura Davis**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
SUZANNE ANDERSON, et al.,

**AFFIDAVIT OF**  
**EMIKO UHURA DAVIS**

Plaintiffs,

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF DELAWARE )

: SS.:

COUNTY OF NEW CASTLE )

EMIKO UHURA DAVIS, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 633 S. Brownleaf Road, Newark, Delaware 19713.

2. I am currently 41 years old, having been born on February 25, 1981.

3. I am the daughter of Harry Davis, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. On November 11, 2016, my father passed away from multiple myeloma. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. My dad was a great provider. Growing up, my brother and I wanted for nothing. My father ensured that we kept busy with extracurricular activities, including karate class. My dad was the primary breadwinner. He was a fireman with the FDNY and would have to travel to work from our home in Delaware. As a result, there were some weeks when we couldn't see

each other as frequently, but he was always supportive and would be present as much as possible. While I've resided at my current home in Newark, Delaware since approximately 1995, my dad moved out of Delaware in 2002 after my parents divorced. From there, he moved to Maryland for a short while and later moved to Oxford, Pennsylvania. In the years before my dad passed away, I would visit him in Oxford as much as possible. We would plan to spend the day together, do something special, or just hang out. When we weren't together, I would be in constant contact with my dad by talking on the phone or exchanging text messages. Even though my parents divorced, my father respectably maintained his responsibilities and continued to send us money to help with the mortgage payments and to make sure other necessary bills were paid and current.

6. After my dad moved out in 2002, I learned he had other children I was unaware of. I became more focused on my mother's health issues, so my dad and I didn't have much of a relationship during that time. However, things changed around 2008, when we set our differences aside. After that, I went to visit him quite often. We reconciled because I was in a toxic relationship at the time, and my father was able to comfort and support me after my boyfriend shot himself in my car right before my eyes. My dad stepped in because he understood what a traumatic event that was for me and extended much-needed compassion toward me during that time. I truly appreciated having my dad there for me because I wasn't in a healthy mental state. I ended up staying at my dad's house for a while. After the reconciliation, we often spent time together and occasionally went out to eat. My dad was usually a homebody because his eyesight wasn't the best, and he couldn't drive too far. Once I was back on my feet, I would visit him in Oxford, where we would spend quality time together on the weekends.

7. On 9/11, my father worked as a firefighter and first responder with the FDNY. He worked with FDNY's Squad 18, which was hit particularly hard by the terrorist attacks. The squad lost seven firefighters and its engine that day. It should be noted that my father was assigned to work on 9/11 but had switched shifts with another firefighter beforehand. Nevertheless, upon hearing about the attacks, he returned to the World Trade Center to assist in any way he could. Had my dad maintained his original schedule, it's possible he would have died that day along with his fellow members of Squad 18. When he returned from work after 9/11, I remember him crying and looking like he was completely shocked. Aside from that, he didn't

talk much about what had occurred. However, it was unmistakable that he suffered from survivor's remorse.

8. My father became ill when things were complicated between us. He told me that he was sick, but, at first, he did not reveal just how serious things had become. He didn't go into detail about his illness. I believe he felt guilt over what had transpired between him and my mother. Around 2002, my mother became disabled, and I became her primary caregiver. Since my dad had already left, I assumed responsibility for that role. As a result, I don't think he felt comfortable telling me that his condition was as severe as it was because he didn't want to burden me more. I could tell that my dad wasn't well, but he didn't offer many details because he didn't want any attention from me in that way. As a result, his cancer was already much further along than I even realized by the time he was on his deathbed.

9. Learning about my dad's passing away was devastating and still hurts today. I still keep his text messages on my phone to help preserve some of the memories we shared. Dad was a great provider and helped me financially with my mother. But emotionally, I feel like I'll never recover from losing him. I tried my best to get through it, but it has been very hard. After my dad died, I felt scared and alone because he was someone who really stood by me and supported me at a time when I struggled. As a result, there is an emptiness after he passed away, even though I try to focus on the good times. That's why I still look at his text messages, and there's not a day that goes by that I don't think about him.

10. Even though he was married to somebody else, he still provided for my family until he passed away. So, at that time, I did experience some financial impact and was left to pay for his funeral expenses. My mother and I struggled financially for a few years without his support but eventually got through it. Thankfully, we were able to keep our house, even though there were times money became very tight.

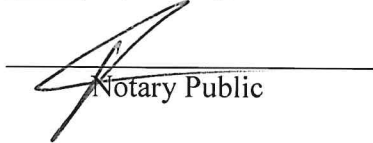
11. My father had his faults, but he was loved. It is still difficult emotionally with him being gone. It bears emphasizing that my dad prided himself on being a provider for his family,



and nobody can question that he went out of his way to honor his commitments to his family.

  
EMIKO UHURA DAVIS

Sworn to before me this  
21 day of July, 2022

  
Notary Public

**DAJON JERMEL FRANCIS**  
Notary Public For The State Of Delaware  
My Commission Expires 27 July 2023  
Commission # 20210727000015

**Esther Davis**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
SUZANNE ANDERSON, et al.,

**AFFIDAVIT OF  
ESTHER DAVIS**

Plaintiffs,

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF MARYLAND     )  
                                  : SS.:  
COUNTY OF CECIL         )

ESTHER DAVIS, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 107 Chesapeake Ridge Lane, Apt 2D, North East, MD 21901.

2. I am currently 73 years old, having been born on May 7, 1949.

3. I am the wife of Harry Davis, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband passed away from multiple myeloma and respiratory illness on November 11, 2016. It was medically determined that these illnesses were causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. I met Harry when I was sixteen years old. Harry and I knew each other for a long time, but we both had been married and divorced before we got together. We re-connected in 2000 and got married in 2002, right after 9/11. Harry and I loved to travel. We traveled a lot to New York. We traveled across the country at least once, from New York to California. We wanted to go cross-country from California to New York too, but we never got a chance to. We



went to Boston every year. We did a lot of spontaneous traveling, too. We moved to Maryland and built a home, which was supposed to be our dream home.

6. Harry worked for the Fire Department, and I worked for the NYPD. I worked in Crime Analysis. On the morning of 9/11/2001, I had just dropped my son off at school and I was entering the precinct. My coworkers said to me, "Esther, a plane just hit the World Trade Center." Harry was on a detail in the Bronx, and he called me and told me, "Esther, I have to go down there." I was watching the TV, seeing it all happen. Harry was about to enter the second tower when it began to collapse, and luckily, he escaped that. That experience was very hard on him. As a senior member of his team, he blamed himself for letting his coworkers perish in the collapse. He helped recover many of his coworkers' bodies from the rubble during the recovery effort. Of course, he went through therapy after that. Every year, he was always sad on the anniversary of 9/11.

7. When Harry retired from the FDNY in 2002, he was certified for 9/11-related illness because he had lung issues. When we moved to Maryland, Harry would see doctors regularly. One of the doctors gave him a blood test, and then referred him to a cancer doctor. The doctor they referred him to was in New York, at Mount Sinai. He was certified in 2012 by the World Trade Center Health Program for multiple myeloma.

8. Harry had trouble breathing and pain in his chest. We would be working in the yard, and he would need an albuterol inhaler, and then he would be out of breath very easily. He was always tired; he didn't have a lot of energy. He wasn't as active as he used to be. He would just stay in the house and watch television. Harry saw a local doctor through the World Trade Center Health Program. We didn't start radiation or chemotherapy, because we didn't want to decrease his quality of life. There's no cure for multiple myeloma, so we didn't do as much treatment. The multiple myeloma also impacted his breathing problems, and he would often complain of pain.

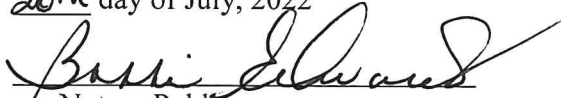
9. After Harry was diagnosed with cancer, I was worried about being alone. But he assured me I would always be taken care of, and he tried to get me not to worry about his health. I knew that Harry was preparing to die, in a way. In 2016, the year he died, he paid each of his children \$10,000. Harry's death was very sudden—he was in our backyard when he died. I came home one day, and he was passed out on the floor. I called the ambulance, but when they

got there his heart had already stopped. I felt lost. Harry was my provider. The shock of his death really impacted me. My hair started coming out, and I have many bad memories from that time.

10. The same year Harry died, I had just had a third of my lung removed in surgery. I was also diagnosed with lung cancer. It was a difficult time for all of us. His mother had died just months before he died. I could tell he was suffering, and that he was in a lot of pain. After his death, I felt completely lost. I couldn't deal with all the death going on around me. I had to get rid of our home after his death. I still feel like I haven't recovered.

  
ESTHER DAVIS

Sworn to before me this  
20th day of July, 2022

  
Notary Public



**Jonathan Tehama Davis**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
SUZANNE ANDERSON, et al.,

**AFFIDAVIT OF**  
**JONATHAN TEHAMA DAVIS**

Plaintiffs,

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF DELAWARE                    )  
  : SS.:  
COUNTY OF NEW CASTLE            )

JONATHAN TEHAMA DAVIS, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 118 Whitburn Place, Newark, Delaware 19702.

2. I am currently 38 years old, having been born on September 30, 1983.

3. I am the son of Harry Davis, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. On November 11, 2016, my father, Harry Davis died from multiple myeloma. It was determined by the World Trade Center Health Program that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My father and I had always been close. However, once he retired and moved to Pennsylvania, which was a little closer to me, our bond grew even stronger. I started to see him much more frequently. As I was older, we didn't spend as much time together as when I was younger, but our connection grew in different ways. I could always go to my father for guidance. When I got married in 2013, I sought his advice on women, marriage and starting a family. He



never steered me wrong. We would just talk, man to man, father to son, which I treasured. Once I became a father myself, he gently offered his advice since he had experienced all the things I was going through. After my dad was diagnosed with cancer, he opened up even more to me. When my son was born, I felt closer to my dad than ever before. I would try to take my son to visit him as often as possible so they could bond.

6. The day before September 11, 2001, my father had worked the nightshift and requested a shift change with another fireman for the following day. Even though my dad was no longer assigned to work on 9/11, as soon as he heard word of the terrorist attacks, he immediately rushed to his stationhouse. By the time he arrived, all of his comrades of Squad 18 had already left the house. After 9/11, my dad continued to help with the rescue and recovery efforts at the World Trade Center site until the mission was completed. When 9/11 happened, I remember I was in college at the time, and my mom told me how scared she was not knowing whether my father was alive or dead. It wasn't until late in the evening that we heard anything from my dad. The fact that my family and I were in suspense about my dad's condition added to the entire trauma of 9/11.

7. I wasn't aware of the extent of my dad's cancer until sometime later. My sister Kosiko told me about it after she learned of his diagnosis. I understand that he was making some provisions regarding his affairs, but overall, he didn't expound on his health problems too much. He tried to be optimistic about his prognosis so as not to worry his family. Looking back, I can see that after his diagnosis he had become a little more introspective than I knew him to be when I was younger. Before the cancer, he never exhibited many health issues, other than some slight weight gain, but didn't talk much about it. My dad always tried to focus on the positive.

8. My oldest son was about to turn three years old when my father passed away. It was nice to see my father become a grandfather and interact with my son. I wish my dad could have seen him grow older, although I am grateful that they had the chance to meet. Before he died, my dad bought my son a "Davis Chain," a chain with a firefighter on it, which he still has to this day. This is very special to me because my dad had given Davis chains to my sister and me as well. Unfortunately, my dad didn't live long enough to meet my second child. That hurts me for both of them.

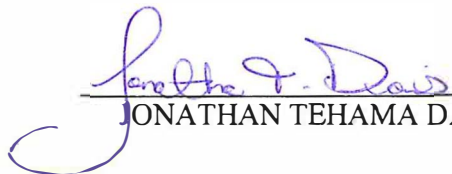
9. We don't have a history of cancer in our family, so I was shocked to learn of my father's multiple myeloma. I always felt that my father was a *Superman* being a firefighter. I never imagined that something like cancer would take him out. Learning of my dad's cancer was definitely hurtful. What is most painful about my dad's passing away is the fact that I'm a father of two and so desperately wanted my father to see them grow and become adults. We had so many wonderful, in-depth conversations before he passed. I truly appreciated my father's wisdom. I became more mature. I was counting on him being there as a valuable resource and sounding board to help me navigate the bigger life questions. I'm now robbed of that opportunity. My father's cancer also created a certain level of fear in me. As a young parent, the thought of life without my children, or theirs without me, is terrifying.

10. When he moved to Pennsylvania, my dad intended his new home as a place for us to come and stay for extended periods of time. He would often tell us that each of us would have a room and always be welcome to stay there. Had my dad lived longer, I am certain that we would have enjoyed a number of leisure activities and relaxing hobbies together.

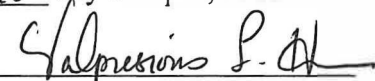
11. Apart from changes to his diet, I wasn't too involved in my father's cancer related care. Although we did speak frequently, my father didn't talk much about his illness. We lived roughly 25 minutes away from each other, so I couldn't see him as often as I would have liked. The last time I saw him, he came into my store when I was working, and he bought a bunch of healthy alternatives and snacks. We had a very good visit, and I tried to help him keep his weight under control, because I had some success along those lines. I would have loved to have seen his progress and become even more involved in his care, but I didn't have the chance because his cancer progressed so rapidly.

12. I definitely believe that working at the World Trade Center site, with all of its horrors and toxic fumes, not only was responsible for causing my father's cancer, but for his psychological damage as well. He lost many friends and comrades, and it changed him. I guess

the whole country had a certain amount of trauma that resulted from 9/11. It was a day that will live in infamy for our family. We will never forget.

  
JONATHAN TEHAMA DAVIS

Sworn to before me this  
25<sup>th</sup> day of April, 2022

  
Notary Public



**Kosiko Imuhri Davis**



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
SUZANNE ANDERSON, et al.,

**AFFIDAVIT OF  
KOSIKO IMUHRI DAVIS**

Plaintiffs,

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF DELAWARE            )  
  : SS.:  
COUNTY OF NEW CASTLE        )

KOSIKO IMUHRI DAVIS, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 143 Dunsinane Drive, New Castle, Delaware 19720.

2. I am currently 42 years old, having been born on December 4, 1979.

3. I am the daughter of Harry Davis, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. On November 11, 2016, my father passed away from multiple myeloma. He also had a multitude of respiratory issues. It was determined by the World Trade Center Health Program that these illnesses were causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. I always felt a very close connection with my father. He was my hero. My father was that one person by whom I could never do wrong. He always had my back, no matter what. My father called me "Harry Face" because we looked so much alike. And when he looked at me,

he saw himself. Throughout my whole life, we just bonded.

6. On September 11, 2001, I was in Delaware. My father was scheduled to work a shift on September 11<sup>th</sup> but had switched with another firefighter so that he could have the day off. On his way out of the city, my father heard on the radio that the first tower of the World Trade Center had been hit. As the streets began to fill up with many people trying to leave Manhattan, my father turned around and went back. By the time he got to the station, his squad had already rushed to Ground Zero. My father dressed and prepped alone at the station and then drove his old Volkswagen Rabbit to the site and got to work with the FDNY and the other first responders. The squad lost its truck and seven members that day, including the firefighter who switched shifts with my father. Dad was luckier than most and survived that day but was later diagnosed with lung disease and multiple myeloma. As a result of being exposed to all the toxins at the site, it ultimately shortened the life of the great Harry Davis. He left this earthly plane on November 11, 2016, but he did some fine work while he was here. After the attack, my family and I didn't hear from him for six or seven days, as there were no phone lines and communications were not working well. We didn't know if he was dead or alive until he finally contacted us. Aside from some time to sleep, my dad was working for months at the site helping to clean up. He discovered bodies as well as many other grim realities that resulted from 9/11. It gives me the chills to think about this. My father easily could have died that day since usually he was the driver of the fire truck – the same one that was demolished by the attack. He was supposed to be there, and only because he switched shifts did he survive. The firefighter who he switched shifts with died. My father dealt with a tremendous amount of trauma, guilt and anxiety over that. As a result, he was prescribed medication for anxiety and would speak to therapists about the guilt and sadness he felt. My father became depressed for a long, long time.

7. In 2004, after I graduated school in Pennsylvania, I moved to New York. My father had already retired and was living in Maryland. Despite the distance, my dad would come up to New York on a regular basis to visit me, probably every other week or so. Whenever he was in the city, I would host my dad and prepare dinner for him. Regardless of where I was living, my dad was always just a touch away. Around 2007, my dad moved to Oxford, Pennsylvania, which was nice because at that time I was living in Delaware, and he would be

very close to my home, approximately only 30 minutes away.

8. When dad was nearby in Oxford, I would invite him, as well as my brother and nephew over to my house frequently to bring the family together and help my dad grow a bond with his little <sup>grandson</sup> ~~nephew~~. My nephew resembled my father so much that he would say, "This boy looks more like me than I do." When I posted photos of them on Facebook, all of his firefighter colleagues would comment to my dad that it looks like you're carrying a baby version of yourself, which really touched my heart.

9. Being a firefighter for 29 years, my father was always pretty fit. However, after developing the breathing difficulties, I can see my father's activity levels decreased substantially. Despite being a runner for years, he wasn't able to run. As a result, he started to gain weight and his blood sugar went pretty high. My father used to be able to pick me up with one hand, but over time, he had to use a cane and had a persistent cough. Sometimes I would have to pry information out of my father when I knew he was going to the doctor. He would always try to divert the conversation. When I learned he was going to a hematologist, I pressed him on the issue, and he admitted that he was having his bone marrow checked. He finally revealed that he was diagnosed with multiple myeloma. I was heartbroken. I immediately offered to donate my marrow or help in any way that I could, but my father insisted they were only monitoring things at that point. He didn't even have a chance to undergo chemotherapy. The cancer was truly awful, and the fact that he had underlying respiratory issues only made it worse for him. It stopped him from being as mobile and as active.

10. The last time I saw my father was the week before he died. We took my nephew to the Cowtown flea market in south Jersey. We spent a really lovely day together, just the three of us. Unfortunately, during the trip, I knew that something wasn't right and my dad wasn't feeling well. He seemed uncomfortable and had to stop several times just to catch his breath. He was able to drive us back to Delaware but had to pull over to the side of the road at one point. I asked him if he was okay, and he claimed he was fine. I offered to drive the rest of the way home, but he refused. Once we arrived back in Delaware, I suggested that he and I go to the hospital together, just to be safe. He stubbornly refused and left. One week later, my dad passed away.



11. Reflecting on the last time I saw my father is very difficult. I often wonder if I had just taken him to hospital when we returned to Delaware whether we would have had more time. The next week, my father died after collapsing while he was maintaining his lawn on a riding lawn mower. It's distressing to think that before my father's illness, he actually preferred a push mower, but he no longer had the lung capacity to push one.

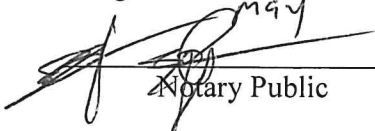
12. My father was literally larger than life. In fact, he was even featured in the book, *Faces of Ground Zero*, on page two. At an exhibition of the *Faces of Ground Zero*, the photographs were blown up to be around 11 feet tall. For me, that's how I always viewed my father. I never thought anything was going to take him out as early as his cancer did. I kept telling myself that he would be able to survive longer and we would have more time with him. I would have done anything. When he had the lung issue, I wanted to get him an oxygen tank. And when he had cancer, I wanted to donate bone marrow. Aside from that, what affected me the most, more so than the physical illnesses, was seeing the toll that my dad's experience had on him emotionally. When I found out he was taking antidepressants, I knew that was because of 9/11 and that really made me worry because I knew that there was nothing that I could do for his mental health. Once I learned he took antidepressants, my first thought was that whatever he was going through must have been extremely traumatic. Otherwise, my dad was not the type of person to even consider such a treatment. That's what hurt me the most.

13. Recently, in preparation of this affidavit, reflecting on my father's life, his experience on 9/11, and the illness that resulted has been extremely difficult. However, I'm encouraged to know the truth that love still prevails above all else. After posting a tribute to my dad on Facebook on September 11, 2021, even though that was over six months ago, in recent days the post has been shared by many people and liked by over 562 people. People who are not even in my network. The FDNY community, including the fire department and the brotherhood of firefighters, and so many others have been commenting and liking it. For me, I feel that's a sign that my father, from wherever he is, is saying, "This is okay. You'll get through this." It is remarkable how just two days before preparing this statement, the 9/11 post has received so much attention, with reminders of my father's heroism, and prayers and wishes that he rests in

peace. I'll always remember the impact that my father had on New York, his family, on me, and on the world.

  
KOSIKO IMUHRI DAVIS

Sworn to before me this  
06 day of ~~April~~ <sup>May</sup>, 2022

  
Notary Public

JOSHUA KOBER  
NOTARY PUBLIC  
STATE OF DELAWARE  
MY COMMISSION EXPIRES 04/21/2024

**Lakala Kuahna Davis**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

SUZANNE ANDERSON, et al.,

**AFFIDAVIT OF  
LAKALA KUAHNA DAVIS**

Plaintiffs,

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF PENNSYLVANIA     )  
                                      : SS.:  
COUNTY OF MONTGOMERY     )

LAKALA KUAHNA DAVIS, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 300 Village Drive, Apt. 452, King of Prussia, Pennsylvania 19406.
2. I am currently 43 years old, having been born on July 30, 1978.
3. I am the son of Harry Davis, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. On November 11, 2016, my father passed away from multiple myeloma. He also had a multitude of respiratory issues. It was determined by the World Trade Center Health Program that these illnesses were causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.
5. During my childhood, I have good memories of playing sports and a lot of video games with my dad. My dad was always there for me. In 1999, at the age of 20, I joined the Marine Corps and left home. Until then, my dad was a consistent figure in my life. After I left

home, 9/11 happened, and sometime after that, my parents' marriage ended. Once my parents divorced, I saw my dad much less frequently.

6. Before leaving for Okinawa, Japan with the Marine Corps, I wanted to visit my father one more time because I knew I would be overseas for more than a year. During my visit, my dad and I were walking around Times Square, and I asked him which part of the city his firehouse, Squad 18, served. He explained that their territory was downtown and included the area in and around the World Trade Center. On September 11, 2001, I was still in Okinawa when I received the news about the terrorists attacking the twin towers. I remember realizing that my father may have been one of the first groups of firefighters responding to the scene. I became worried that he may have been one of the first casualties.

7. Unfortunately, my father did not share information regarding his health status with me. Since he did not inform me about the severity of his condition, time passed by fairly quickly, and before I realized how serious his cancer was, he had already passed away. My mother and I attended his funeral. Speaking with my father's friends and colleagues at his memorial allowed me to learn about his life and work. What made an impression on me was how my father's funeral was well-attended by those in the FDNY community. The firefighters helped bury him and all acknowledged how much they respected my father. I truly appreciated meeting the men my father served with, shaking their hands, and conveying how much I appreciated their presence.

8. Once I learned about my dad's passing away, I felt a significant sense of regret that we didn't have more time together. Remarkably, through his passing away, I had the opportunity to meet my half-brother and half-sister, who spoke beautifully at my father's funeral. I'm glad that I could better understand another dimension of my extended family and perhaps explore that more in the future.

9. It is painful to think that there was so much more my father, and I could have had in terms of a relationship and that we will never have that chance because of his cancer and death. With my dad gone, I feel a profound sense of loss.

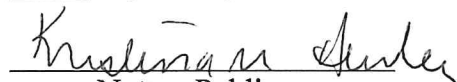
10. In a professional sense, I greatly respected my father and admired him a great deal. Because he was dedicated to his career as a fireman, my father acted bravely and worked to support the rescue and recovery efforts at Ground Zero. It is tragic that someone who sacrificed



so much to protect others after 9/11 had to suffer from such a painful disease as a direct result of those efforts.

  
LAKALA KUAHNA DAVIS

Sworn to before me this  
11 day of July, 2022

  
Notary Public



**Karyne Federbush**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
SUZZANNE ANDERSON, et al.,

**AFFIDAVIT OF**  
**KARYNE FEDERBUSH**

Plaintiffs,

20-CV-00354 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW YORK     )  
                              : SS.:  
COUNTY OF SUFFOLK    )

KARYNE FEDERBUSH, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 2453 Union Boulevard, Building I, Apt 34B, Islip, New York 11751.

2. I am currently 43 years old, having been born on November 21, 1978.

3. I am the daughter of Alan K. Federbush, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from pancreatic cancer on November 6, 2015, at the age of 60. It was determined by the World Trade Center Health Program that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. My father and I were close in the few years before he passed. Our relationship was complicated and often difficult as I was growing up. He and I were very alike. We were both stubborn and would often butt heads. However, in 2013, I gave birth to my daughter, and my father was a very involved grandfather. That's when our relationship started to heal. He and my stepmother would come out and see my daughter and me. We tried to get together as often

as possible, and my father and I had dinner once a week. My daughter had just turned two years old when my father passed away. Once we reconnected, my father was the person I called for everything. He had a great sense of humor. We celebrated the Jewish holidays together, and he helped throw my baby shower. He was always there, even if we weren't on the same page.

6. My father was an electrician who worked for Local 3 Welsbach. On 9/11, he was working on a job just a few blocks away from the World Trade Center when the attacks started. His company sent him into the city to work on recovery efforts. He also participated in the clean-up of wiring and helped for many days down at the site.

7. In the Summer of 2014, my father told me he was having back pain. He was going for MRIs, so I knew there was something wrong. At my daughter's first birthday party in September 2014, he told me that one MRI revealed a tumor in his pancreas and that he was diagnosed with pancreatic cancer. It was a complete shock to me. He underwent chemotherapy treatments at Long Island Jewish Hospital/Northwell Health in New Hyde Park.

8. At first, my father's prognosis was good. Things were going well after the chemotherapy treatment for about a year. He was eating healthier because my stepmother had him on a strict diet. His doctors were cautious but optimistic.

9. Once things took a turn for the worse, it was evident that my father was in great pain. He had lost a lot of weight. Toward the end, his memory and his mind were affected. He would have accidents, like falling out of bed and hurting himself. It was difficult to watch. I slept at my father's house the night before he passed away. We needed to watch him as he would wake up and try to go down the stairs. However, he wasn't lucid, so he didn't know where he was going. I didn't sleep at all that night. We got him into hospice the following morning, and he passed away a few hours later.

10. After dropping my daughter off at daycare, I drove to the hospice. I am grateful that I was able to say goodbye to my father before he passed. I was there for approximately an hour before he died. I told my father that everything was going to be okay and that I loved him, and then he peacefully passed away. I've tried to block out that memory. It hurts me to think about it.

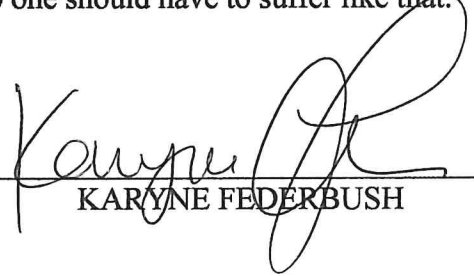
11. I wish my father had been there to see me graduate from school and to see my daughter grow up. He was so involved in her life when she was a baby, and I wish that he had

lived long enough for my daughter to get to know him. It's hurtful to know that, because she was so young, she has no real memory of him because he was taken so soon. I try to keep positive thoughts for myself.

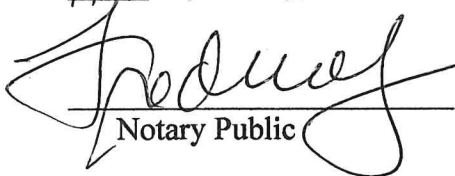
12. My father died so close to my birthday that it was painful to celebrate for a few years after he passed. Thanksgiving, Hanukkah, Christmas, and the New Year were also difficult to celebrate the year he died. Each year on the anniversary of his death, his birthday, and on Father's Day, we go to the cemetery and have a picnic with him in front of his grave. My daughter will go to the beach and pick out shells to place on his tombstone.

13. My father sometimes helped me financially with groceries and repairs. He was very handy.

14. I miss my father. He was a very well-liked man and a good person. He worked very hard. What happened to him was devastating. Nobody should have to go through what he went through. He suffered, and he shouldn't have. No one should have to suffer like that.

  
KARYNE FEDERBUSH

Sworn to before me this  
17<sup>th</sup> day of July, 2022

  
Notary Public

FREDERICK C. OBROCK JR.  
Notary Public, State of New York  
No. 010B6217450  
Qualified in Suffolk County  
Commission Expires February 8, 2026

**Donna Jean Raimondi**



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In Re:

# TERRORIST ATTACKS ON SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

SUZZANNE ANDERSON, et al,

Plaintiffs,

**AFFIDAVIT OF  
DONNA JEAN RAIMONDI**

20-CV-00354 (GBD)(SN)

V.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

STATE OF CONNECTICUT)

$$:SS.:$$

COUNTY OF FAIRFIELD )

DONNA JEAN RAIMONDI, being duly sworn, deposes and says:

1. I am the plaintiff in the within action, am over 18 years of age, and reside at 22 Blueberry Hill Road, Monroe, Connecticut 06468.
2. I am currently 63 years old, having been born on April 30, 1959.
3. I am the wife of Michael Raimondi, Jr., upon whose illness my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My husband passed away from respiratory failure on January 12, 2015. It has been medically determined that his respiratory illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.
5. I had a great relationship with my husband. We were so compatible even though we had a fifteen-year age difference. We loved doing things together – traveling, going to the beach, and

hosting friends for dinner. We valued family above all else and worked hard and went through IVF to have our two girls, Gianna and Jeanine. We loved being parents and spending time with our kids. We loved going to the beach together as a family since we had a house on the Jersey Shore. We moved to our dream home in Connecticut a few months before 9/11 and loved hosting the kids' friends and having pool parties and cookouts at our house. We wanted to give our kids the best life that we could and all the advantages we never had growing up.

6. On 9/11, my husband worked as a foreman doing a highway construction project on Brooklyn Boulevard. Following the terrorist attacks, he was called down to the World Trade Center to do search and rescue and clean up. He was one of the first people on site alongside the first responders since they needed experienced construction crews to help look for survivors underneath the rubble. He wasn't able to get in touch with us to let us know he was alive for over 24 hours. He made his way to my sister's house in the Bronx and was in total shock. He was covered in dust, debris, and dirt and had no protective equipment to shield him from it. He described in vivid detail the horror that he saw helping with search and rescue efforts including finding severed body parts. He couldn't stop talking about it. He worked around the clock and was never home, so I was left to care for our daughters by myself. He told me how the smoke didn't stop rising for a long time after 9/11 since everything was still smoldering and burning. He could never forget the sights and smells. He continued to work at the World Trade Center for over 6 months and would commute back and forth from our home in Connecticut and only be home for a few hours at a time. He carried a heavy burden based on what he saw. He became incredibly withdrawn. He kept graphic video tapes of the search and rescue that he would watch for years and re-live the traumatic experience that he had helping rescue and identify dead bodies. He always struggled on the anniversary of 9/11 and was never the same again.



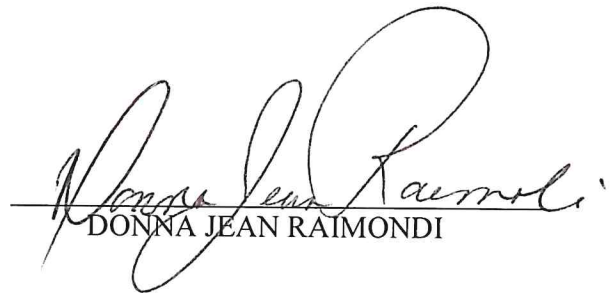
7. After 9/11, my husband started having severe health problems. He developed breathing issues almost immediately and was coughing for months on end including at night which woke me up. He had to see a pulmonary specialist for his breathing issues. He had lots of testing done at Mt. Sinai and was diagnosed with RADS and lung disease. He was prescribed strong medications to treat the lung issues, but they had major side effects. He had a heart attack and had to have a stent placed in 2006. He had so many health issues he had to go on disability and stop working. He could no longer travel or do things he used to do. It was a wakeup call and impacted his enthusiasm for life since he had such pride in his ability to work and provide for our family. He became a different man, withdrawn and depressed watching the bills mounting.

8. My husband's illness and death took its toll on me emotionally. I became his caregiver, which was a full-time responsibility and made me worried all the time that he would stop breathing or need to be rushed to the hospital. I remember one time my husband collapsed and couldn't get out of bed, so I had to enlist my kids to help me lift him in the middle of the night and get him to the ER. I had to monitor his medications which caused huge side effects including one time where he told me it felt like his body was burning from the inside out. It hurt me to watch my husband go from a strong man and provider to someone who needed to be taken care of and receive so much help. I was heartbroken for our children that they would never know the man that I loved and had to watch their father in pain. I was sad that our carefree family life was gone.

9. Losing my husband destroyed our family financially. We went from happy and financially stable – owning our own home, saving for our kids' college funds, and traveling – to scraping by overnight. We were left with large medical bills from all his treatments and medications. We had to say goodbye to our family home and all the memories there because we

couldn't afford to keep it. We struggled to have insurance cover my daughter Jeanine who developed type 1 diabetes and needed treatment. We had to provide for ourselves – including having my children go to work and me going back to work as a nurse – to make ends meet.

10. My husband and I built our dream life together and had the perfect family. 9/11 changed everything – my husband was forever haunted by memories of the terrorist attacks and the graphic images he witnessed working search and rescue at the World Trade Center. He became very withdrawn and depressed but didn't want to believe life had changed so much. He got sicker and sicker until he could no longer work and provide for our family. He is gone now and has missed all the big milestones in our life and our girls' lives which would have broken his heart.



DONNA JEAN RAIMONDI

Sworn to before me this  
18<sup>th</sup> day of July, 2022



Notary Public

**PHYLLIS J. MOFFETT**  
**NOTARY PUBLIC**  
My Commission Expires June 30, 2025